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Attorneys for Defendant,
Counterclaimant and Third-Party Plaintiff
NATIONAL FIRE & MARINE INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PN II, INC. dba PULTE HOMES and/or DEL
WEBB, a Nevada corporation,

Plaintiff,

v.

NATIONAL FIRE & MARINE INSURANCE
COMPANY; and DOES 1 through 100,
inclusive,

Defendants.

Case No. 2:20-cv-01383-ART-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
SCHEDULE REGARDING NATIONAL
FIRE & MARINE INSURANCE
COMPANY'S MOTION TO REOPEN
DISCOVERY (ECF 185) AND PN II,
INC.'S MOTION IN LIMINE TO
EXCLUDE TOM MORTLAND (ECF 184)**

STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE REGARDING
NATIONAL FIRE'S MOTION TO REOPEN DISCOVERY (ECF 185) AND
PN II, INC.'S MOTION IN LIMINE TO EXCLUDE TOM MORTLAND (ECF 184)

Case No. 2:20-cv-01383-ART-BNW

NATIONAL FIRE & MARINE
INSURANCE COMPANY, a Nebraska
insurance company,

Counter-Claimant,

v.

PN II, INC. dba PULTE HOMES and/or DEL
WEBB, a Nevada corporation,

Counter-Defendant.

NATIONAL FIRE & MARINE INSURANCE
COMPANY, a Nebraska insurance company,

Third-Party Plaintiff,

v.

PN II, dba PULTE HOMES and/or DEL
WEBB, a Nevada corporation;
CONTRACTORS INSURANCE COMPANY
OF NORTH AMERICA, INC., a Hawaii
corporation,

Third-Party Defendants.

Dept.: 4B
Judge: Hon. Anne R. Traum
Complaint filed: July 24, 2020
Trial Date: Not set

**TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR ATTORNEYS
OF RECORD:**

Plaintiffs/Counter-Defendants PN II, Inc. dba Pulte Homes and Del Webb (“Pulte”),
Defendant/Counter-Claimant/Third-Party Plaintiff National Fire & Marine Insurance Company
 (“National Fire”), and Third-Party Defendant Contractors Insurance Company of North America
 (“CICNA”), by and through their respective counsel of record, hereby stipulate to extend the
responses and replies to the following motions: (1) National Fire’s Motion to Reopen Discovery
 To Allow Depositions of Two Individuals filed on March 24, 2025, ECF 185 and (2) Pulte’s
 Motion in Limine To Exclude Tom Mortland as a Trial Witness filed on March 24, 2025, ECF
 184.

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STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE REGARDING
NATIONAL FIRE’S MOTION TO REOPEN DISCOVERY (ECF 185) AND
PN II, INC.’S MOTION IN LIMINE TO EXCLUDE TOM MORTLAND (ECF 184)

Per the agreement of the parties, oppositions currently due on April 7, 2025, will be extended to April 14, 2025, and the deadline for replies will be extended to April 28, 2025.

The parties have met and conferred regarding their respective schedules and agreed to extend these deadlines because of the significance of each of the motions and due to the parties' schedules.

In accordance with LR IA 6-1, there have been no prior extensions solely to extend the briefing on National Fire's Motion to Reopen Discovery or to extend the briefing on Pulte's Motion in Limine to Exclude Tom Mortland.

IT IS SO STIPULATED.

DATED: March 28, 2025

PAYNE & FEARS LLP

/s/ Sarah J. Odia

Scott S. Thomas

Sarah J. Odia

Daniel L. Rasmussen

Camilla J. Dudley

Attorneys for Plaintiff/Counter-Defendant PN II, Inc.

DATED: March 28, 2025

GIBSON, DUNN & CRUTCHER LLP

/s/ Deborah L. Stein

Marcellus A. McRae

Deborah L. Stein

Attorneys for Defendant, Counterclaimant and Third-Party Plaintiff National Fire & Marine Insurance Company

1 DATED: March 28, 2025

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3 /s/ Dawn A. Hove

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Jeff N. Labovitch

5 Attorneys for Defendant, Counterclaimant
6 and Third-Party Plaintiff National Fire &
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9 DATED: March 28, 2025

BROWN, BONN & FRIEDMAN, LLP

10 /s/ Thomas Freidman

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13 and Third-Party Plaintiff National Fire &
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1 DATED: March 28, 2025

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11 /s/ Natasha Landrum

12 Natasha Landrum

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14 Contactors Insurance Company of North
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18 /s/ Amy B. Briggs

19 Amy B. Briggs

20 Attorneys for Defendant, Counterclaimant
21 Contactors Insurance Company of North
22 America (*pro hac vice application pending*)

ORDER

IT IS SO ORDERED. Responses to National Fire's Motion to Reopen Discovery To Allow Depositions of Two Individuals (ECF 185) and Pulte's Motion in Limine To Exclude Tom Mortland as a Trial Witness (ECF 184) are due by April 14, 2025, and replies in support of the Motions are due by April 28, 2025.

DATED: 3/31/2025


UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

PN II, Inc. dba Pulte Homes and/or Del Webb v. National Fire & Marine Insurance Company, et al.
United States District Court, District of Nevada, Case No. 2:20-CV-01383

I HEREBY CERTIFY that on this 28th day of March 2025, a true and correct copy of
**STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE
REGARDING NATIONAL FIRE & MARINE INSURANCE COMPANY'S MOTION
TO REOPEN DISCOVERY (ECF 185) AND PN II, INC.'S MOTION IN LIMINE TO
EXCLUDE TOM MORTLAND (ECF 184)** was served by electronically transmitting the
document(s) listed above to the e-mail address(es) set forth in the attached Service List:



Maricar De Los Reyes

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